

UNSEALED 9/21/12

KCM

~~SEALED~~UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

12 SEP -5 PM 4:17

UNITED STATES OF AMERICA

Magistrate Case No. 12MJ3293

Plaintiff,

v.

Anthony Khyree Dotson,

Defendant.

COMPLAINT FOR VIOLATIONTitle 18, U.S.C. §1591(a) and (b)-  
Sex Trafficking of a Minor

The undersigned Complainant, being duly sworn, states:

Count 1

In or about October 2011, within the Southern District of California, defendant ANTHONY KHYREE DOTSON, knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, to wit: Juvenile Female 1 (JV1), knowing and in reckless disregard of the fact that JV1: (1) would be caused to engage in a commercial sex act; and (2) having had a reasonable opportunity to observe JV1 and knowing and in reckless disregard of the fact that JV1 had not attained the age of 18 years; in violation of Title 18, United States Code, Sections 1591(a) and (b).

Count 2

In or about and between November 2011 and January 2012, within the Southern District of California, defendant ANTHONY KHYREE DOTSON, knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, to wit, Juvenile Female 2 (JV2): (1) knowing and in reckless disregard of the fact that JV2 would be caused to engage in a commercial sex act; and (2) having had a reasonable opportunity to observe JV2 and knowing and in reckless disregard of the fact that JV2 had not attained the age of 18 years; in violation of Title 18, U.S.C., § 1591(a) and (b).

And the complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
Marc Jose, Special Deputy U.S. Marshal

Sworn to me and subscribed in my presence this 5 day of Sept, 2012.

  
UNITED STATES MAGISTRATE JUDGE

A.W.

(1) KCM

**STATEMENT OF FACTS**

On October 4, 2011, detectives from SDPD Vice Operations conducted an "incall" operation. During the operation, detectives searched online advertisements for escorts on websites commonly used to promote their services, including "backpage.com." SDPD Detective Gilmore #5919 located an ad for a young female nicknamed "Snow" on backpage.com, which provided phone number (6xx) xxx-0038 for contact and contained several photographs of a female wearing lingerie. Detective Gilmore called the phone number and arranged a date with "Snow" for \$150/hr. At approximately 2104 hours, Detective Gilmore called "Snow", later identified as JV1 (C.B. - age 16), and she directed him to meet her at the Motel 6, room #215 located at 5592 Clairemont Mesa Boulevard, San Diego. Once Detective Gilmore arrived at the Motel 6, he met with JV1 and negotiated a prostitution deal with her. After Detective Gilmore arrested JV1 for prostitution, he discovered she was listed as a runaway juvenile, age 16.

In the room, detectives found a cell phone. JV1 stated the cell phone was used in her backpage.com escort ads. The number of the cell phone was (6xx) xxx-0038. Also found in the room was a laptop that contained photographs of JV1. Several of the photographs were the same photographs used in the escort ad of JV1. Detective Gilmore conducted a registry check at the Motel 6 which showed Anthony Dotson registered room #215 on October 4<sup>th</sup>, 2011. JV1 stated that she was working as a prostitute for Anthony Dotson.

Detective Adams #5970 conducted a DMV check and found a California driver license #E1762880 for Anthony Khyree Dotson, with an address at 9010 Avocado, Spring Valley, California. Detective Adams showed JV1 the driver license photograph of Anthony Khyree Dotson which she positively identified as her pimp.

I was then informed of this case and I requested administrative subpoenas for the subscriber information for both the backpage.com ad and any associated ads of JV1, and for the telephone number (6xx) xxx-0038. The results showed the subscriber for both the backpage.com ad and the cell phone was Anthony Dotson, 9010 Avocado in Spring Valley, California.

On November 30<sup>th</sup>, 2011, SDPD Detective L. Johnson, #5954, conducted an "in-call" operation with his team. Detective Johnson called a female posting an ad backpage.com. The ad listed the phone number, (8xx)xxx-1970 and contained several photos of a female. Detective Johnson called the number and arranged for a date with her. She directed him to room #271 of the Homestead Suites located at 9880 Pacific Heights Boulevard, San Diego. After Detective Johnson arrived at the hotel he obtained a verbal agreement for an act of prostitution and she was arrested. The female portrayed herself as the adult, Syniah Carter.

Inside the hotel room detectives found two cell phones. One of the cell phones was used in the above backpage.com escort ad. Detective Johnson conducted a registry check for room #271 which showed registered to Anthony Khyree Dotson, 9010 Avocado, Spring Valley, CA.

1 Carter stated that Anthony Dotson was her pimp and he got the hotel room for her to  
2 work out of. Dotson also took her to the Super 8 Motel in Inglewood, California and the  
3 Extended Stay hotel in Culver City, California to work out of as a prostitute. Carter made over  
4 a thousand dollars prostituting at these two hotels for Dotson and gave all of this money to him.  
5 Carter was taken to jail and charged with prostitution.

6 I was then informed of this case and began to investigate it. I requested administrative  
7 subpoenas for Carter's cell phone (8xx)xxx-1970. The result showed the cell phone was  
8 subscribed to Anthony Dotson with an address 9010 Avocado, Spring Valley, California. I also  
9 requested administrative subpoenas for Carter's backpage ads and any associated ads. The  
10 results showed numerous ads were posted for Carter by Anthony Dotson, 9010 Avocado,  
11 Spring Valley, California.

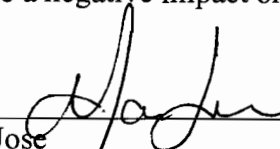
12 I contacted the Super 8 Motel at 4238 Century Blvd. Inglewood, California by  
13 telephone and requested a registry check for Anthony Dotson. The result showed that Dotson  
14 was registered in the hotel on November 24 and 25, 2011. I then contacted the Extended Stay  
15 America Hotel at 6531 S. Sepulveda Blvd, Los Angeles California by telephone and requested  
16 a registry check for Anthony Dotson. The result showed Dotson was registered at the hotel on  
17 November 25 through 29, 2011. This corroborated Carter's statement.

18 In April of 2012, I received an email from the National Center for Missing and  
19 Exploited Children. The email showed the photograph of a female I recognized to be Carter.  
20 The female in the photograph was identified to be the missing juvenile JV2 (D.C. age 16) from  
21 Phoenix, Arizona. She was reported missing November 9<sup>th</sup>, 2011.

22 On June 1, 2012, JV2 was contacted by SDPD Officers at 3200 Main Street in San  
23 Diego. JV2 informed them she was a runaway juvenile and stated that she was working as a  
24 prostitute. JV2 was transported to Police Headquarters where I spoke to her. JV2 told me she  
25 was working for Anthony Dotson in November 2011 when she was arrested as Syniah Carter  
26 until January 20<sup>th</sup>, 2012 when she was arrested in Los Angeles as Syniah Carter for prostitution.  
27 She told me she made around \$4,000 as a prostitute and she gave all of this money to Dotson.  
28 JV2 was shown the California driver license photograph of Anthony Khyree Dotson. Carter  
positively identified Dotson as her pimp.

#### REQUEST FOR SEALING

21 It is further respectfully requested that this Court issue an Order sealing, until further order of  
22 this Court, all papers submitted in support of this complaint, including the probable cause  
23 statement and arrest warrant. Sealing is necessary because premature disclosure of the contents  
24 of this probable cause statement and related documents may cause the defendant to flee and  
25 may cause the destruction of evidence and may have a negative impact on this continuing  
26 investigation.

27   
28 Marc Jose  
Special Deputy U.S. Marshal